

EXHIBIT A

From: David R. Cohen (David@SpecialMaster.Law) <david@specialmaster.law>
Sent: Friday, April 28, 2023 6:22 AM
To: Ryan Moore; Anthony Irpino; Will Lorensen; Josh Gay
Cc: Ronda Harvey; Ashley Hardesty Odell; Idunning@levinlaw.com; Jeff Gaddy; Pearl Robertson; Pete Weinberger; JYoung@ForThePeople.com; Renee Cook; 2804 Discovery, MDL; 'Tracks6to10Defendants@bbhps.com'
Subject: Re: MDL 2804 - New Agenda Item - PEC's Motion Challenging Kroger Privilege Claims

Dear Ryan:

Please see docket no. 3527 at 2 n.6. and accompanying text, where the Court rejected the position you are asserting. The final line of this footnote reads: "Twenty-one days is the default maximum; not the minimum as Walgreens suggests. The Special Master was within his discretion to set the deadline for objecting to his ruling at a time that he considered appropriate under the circumstances."

Nonetheless, in light of the fact that the 30b6 deposition is concluded, I will extend the deadline from May 1, 2023 to May 10, 2023.

-David

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This email sent from:
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From: Ryan Moore <rmoore@bowlesrice.com>
Sent: Thursday, April 27, 2023 10:12 PM
To: David R. Cohen (David@SpecialMaster.Law) <david@specialmaster.law>; Anthony Irpino <airpino@irpinolaw.com>; Will Lorensen <wlorensen@bowlesrice.com>; Josh Gay <jgay@levinlaw.com>
Cc: Ronda Harvey <rharvey@bowlesrice.com>; Ashley Hardesty Odell <ahardestyodell@bowlesrice.com>; Idunning@levinlaw.com <Idunning@levinlaw.com>; Jeff Gaddy <jgaddy@levinlaw.com>; Pearl Robertson <probertson@irpinolaw.com>; Pete Weinberger <PWeinberger@spanglaw.com>; JYoung@ForThePeople.com <JYoung@ForThePeople.com>; Renee Cook <rcook@forthepeople.com>; 2804 Discovery, MDL <mdl2804discovery@motleyrice.com>; 'Tracks6to10Defendants@bbhps.com' <tracks6to10defendants@bbhps.com>
Subject: RE: MDL 2804 - New Agenda Item - PEC's Motion Challenging Kroger Privilege Claims

Special Master Cohen:

Please see the enclosed letter in which Kroger requests that the deadline to file its objections to DR-14, Part 32 be adjusted to May 15, 2023.

Thank you,